

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
FCC Seeks Comment on the National)	ET Docket No. 00-258
Telecommunications and Information)	
Administration's Report "An Assessment)	
of the Viability of Accommodating)	
Advanced Mobile Wireless (3G) Systems)	
in the 1710-1770 MHz and 2110-2170)	
MHz Bands.")	

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The Canadian Wireless Telecommunications Association (CWTA) respectfully submits the following comments in response to the Commission's Public Notice in the above-captioned proceeding, with respect to modifying the Commission's Rules to Allocate Spectrum Below 3 GHz for Mobile and Fixed Services to Support the Introduction of New Advanced Wireless Services.

CWTA represents the wireless telecommunications industry in Canada. It has a membership base of more than 300 companies. CWTA's members come from a variety of sectors, including mobile telephone service providers, paging companies, mobile radio, mobile satellite carriers, and fixed wireless service providers. The CWTA's members serve over 11 million Canadian wireless customers, many of whom frequently roam into the United States. Through various roaming arrangements, the CWTA's members also support the numerous customers of U.S. carriers who roam into Canada annually. In addition, CWTA represents a broad cross-section of manufacturers and equipment suppliers to the industry. CWTA submits these comments in recognition of the closely integrated nature of the mobile telephony industry in North America.

We have reviewed the report of the NTIA¹. The CWTA commends the NTIA for undertaking such a thorough review of the issues at hand. We see this as a positive step towards making available the frequency spectrum bands identified for IMT-2000 in the International Telecommunication Union (ITU) Radio Regulations. The CWTA continues to believe at least 160 MHz of additional third-generation (3G) spectrum will be required by the year 2010 and will be making this case to the Canadian Government as well. CWTA recognizes that the NTIA report only addresses up to 120 MHz and other efforts will be required to identify the remaining spectrum.

Canada and most other ITU Region 2 countries are convinced that most of the new spectrum for advanced wireless services should be identified in the 1700 MHz frequency band. This would be the best and most efficient course of action for the Americas. The CWTA would encourage the Commission and the NTIA to make all the spectrum in the

¹ "An Assessment of the Viability of Accommodating Advanced Mobile Wireless (3G) Systems in the 1710-1770 MHz and 2110-2170 MHz Bands."

band 1755 – 1770 MHz available. The Canadian wireless industry believes that to be useful, the spectrum allocated to 3G services must be contiguous. Piecemeal availability will not allow operators to achieve the potential of 3G.

In the meantime, the CWTA would urge the Commission to make all 60 MHz in the 2110-2170 MHz band available for 3G services. In this regard, the CWTA would suggest that the Commission could immediately pair and make available 45 MHz of spectrum at 1710 MHz with 45 MHz at 2110, while holding the additional 15 MHz at 2100 in reserve for 3G services. While this additional 15 MHz could be made available immediately for carriers to use as additional downstream capacity, this approach presents risks as the ITU has not completed its work on asymmetry, and other uses may conflict with the UMTS downlink band. In any case, it is essential that the spectrum to be made available in the band 2110-2170 MHz starts precisely at 2110 MHz and be contiguous to ensure maximum commonality worldwide.

In conclusion, the Canadian wireless telecommunications industry commends the FCC and NTIA for their efforts, and hopes our suggestions are useful.

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